

EXHIBIT 69

SOMs –Process Flow

Suspicious Order Monitoring Summary (SOM)

Current Process:

- Limited SOM program in the current SAP system
- Robust SOM program at UPS
- UPS is required to have an SOM program because they are the holder of the DEA license
- UPS Customer Service team reviews and releases SOM orders in SAP
- UPS SOM team reviews and releases orders once they hit the UPS warehouse system
-

New Process:

- Robust SOM program in the new SAP system will be implemented on May 5th for the Branded Business Unit.
 - The same SOM program will be implemented for Qtest in July 2014
- Branded orders will go through SOM checks in SAP and then again at UPS under UPS's SOM program

Summary of new SOM process:

Check: Suspicious order management (SOMs) validations are part of the sales order validations which would occur while saving the sales order. Past 12 calendar months data is required to be processed to get the averages by customer, by COT and by NDC so that the current sales order is validated for 3 order dimensions – Quantity (Q), Size (S) and Frequency (F). Also user shall be able to maintain the allowable percentages for QSF by COT. All controls products will fall under this process (Percocet, Opana, Fortesta and Aveed – as examples)

Calculations based on 12 months historical data:

1. Calculate averages for QSF for customers by NDC
2. Calculate averages for QSF for COT by NDC
3. Low history flag calculation to identify new product launches

Quantity (Q)

Formula: Average Quantity per month = Total quantity for 12 month / Months ordered

- By customer, by NDC for a given month, take consolidated invoice quantity as Q for the month which is posted in the same month.

Size (S)

Formula: Average Size per month = Total quantity for 12 months/ Number of orders for 12 months

Frequency (F)

Formula: Average Frequency per month = Total number of orders for 12 months / number of months ordered.

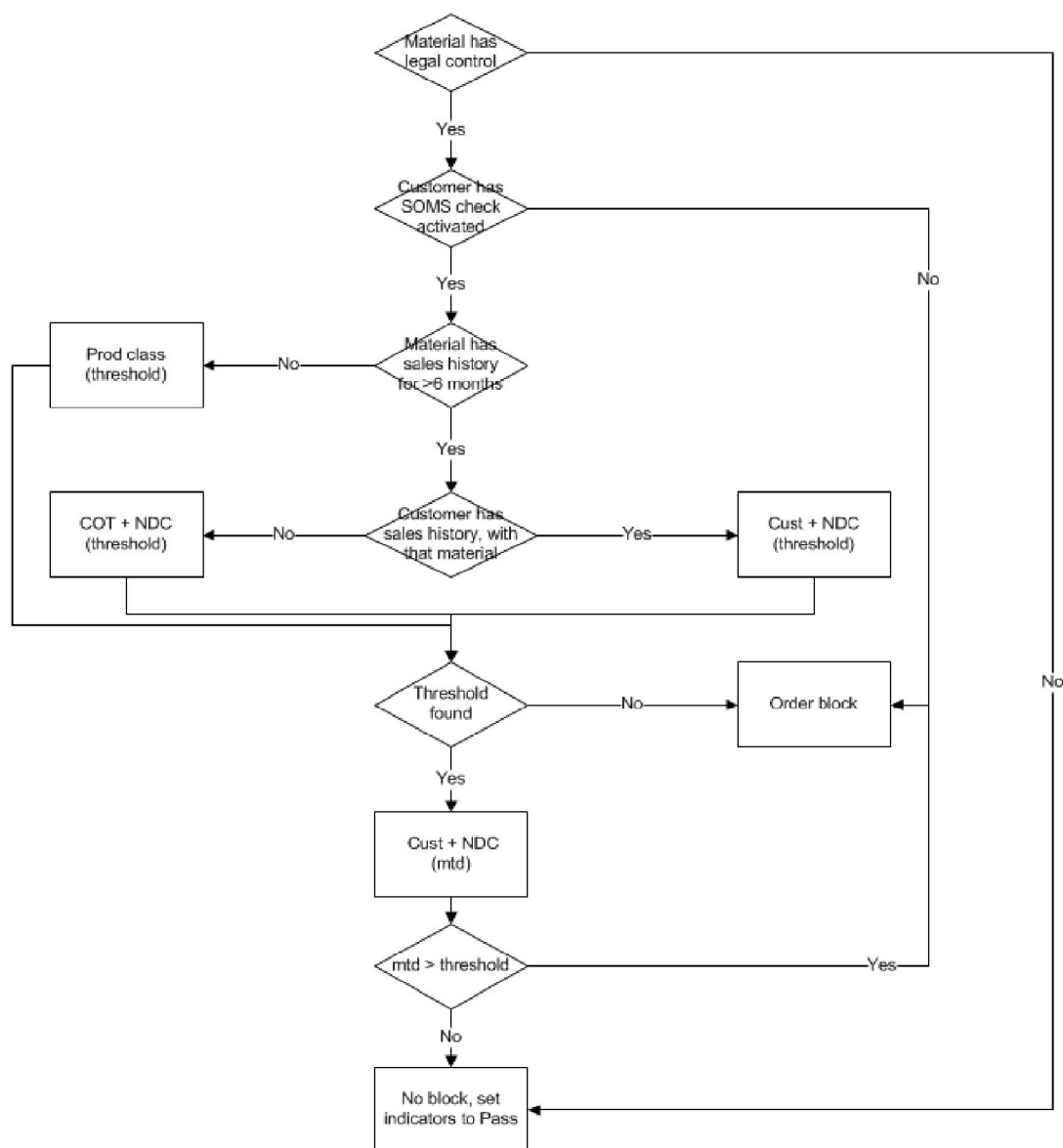
SOMs –Process Flow

-By customer, by NDC for a given month, consider total number of unique sales orders which are invoiced and posted during the month.

Release Code – Every time a user releases the delivery block at the sales order header for the SOMs, a release code is assigned mandatorily and if not assigned the system does not let the user save the order without the delivery block.

Reason Code	Description	Release Code	Description
01	New Business	08	Recall Replacement
02	Seasonal Increase	09	Backorder Fill
03	Change In Order Schedule	10	Dropship
04	Acquicsition	11	Cancelled
05	New Facility	12	Reduced
06	Facility Consolidation	13	OP Data Entry Error
07	Product Luanch	14	Cusomer Data Entry Error

SOMs –Process Flow



SOMs –Process Flow